



April 10, 2006

National Organic Standards Board
c/o Valerie Frances
Room 4008 – South Building
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To Whom It May Concern:

Cyanotech Corporation would like to provide support to the Aquaculture Working Group's Interim Final Report to the NOSB. We wish to acknowledge the work put into this document. It has taken a great deal of effort to create such a concise document on this topic.

The report is well written and communicates effectively. The report is clear and adequate. This interim report is a very good base document from which to develop organic standards for aquacultured organisms.

We have two brief comments regarding the proposed regulations:

In section § 205.258 Farmed aquatic plants.

(b) (1) The transition period for aquatic plants can be reduced to a certain number of harvests as opposed to a set time period, as some aquatic plants tend to produce a 'new' crop in very short time periods. The number of harvests is more important than a set time period for successful transition.

For example, microalgae can be harvested every week. So a new crop is produced weekly. In such short cultivation time periods a crop can transition faster than a one year period (52 harvests seems a bit excessive) from conventional to organic production. We feel that an amendment to this portion of the regulation is in order, although it will most likely be necessary to adjust the number of required harvests to effectively transition from non-organic to organic within groups of plants based on their growth or crop turn-over rate.

In section § 205.252 Aquaculture feed.

There is some ambiguity between feeding an animal its natural food source and feeding one that meets only its minimum nutritional requirements. There is much to learn about what components of natural diets have significant nutritional value.



We feel it is of benefit to the development of standards to add a statement similar to the example presented below.

Example statement: When a natural diet provides more of a nutrient or dietary component than is considered necessary to meet minimum nutritional requirements in a manufactured diet, this nutrient/dietary component (most likely in the form of an additive or supplement) may be used at levels not to exceed those available from the natural food source or diet.

We believe that this agrees with organic standards as there is acknowledgement that the components of a natural diet have potential value to the animal's health. This also acknowledges that our understanding of the natural dietary components may not always be complete and that limiting what is provided in a manufactured diet may cause detrimental effects to the animals, and to the nutritional value of the final product, that are not well understood. Of course, in keeping with organic principles, these nutrients/dietary components should be from sources as close as possible to the natural source available to the animal.

We hope these comments can be utilized to facilitate timely and comprehensive organic standards for aquacultured products in the US to date.

We would like to extend a large Mahalo (thank you) to those that have contributed to and will continue to contribute to these new standards for Organic Aquaculture.

Sincerely,

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